

Jorge Alejandro Rojas  
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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,  
Plaintiff,  
v.  
RONEN OHAYON, *et al.*  
Defendants.

Case No. 2:22-cv-04100-FLA-PVC

**STIPULATION FOR EXTENSION OF  
TIME TO FILE AMENDED ANSWER  
AND/OR MOTION TO STRIKE  
[FIRST REQUEST]**

Current Deadline: October 11, 2022  
Requested Deadline: November 1, 2022

Plaintiff, Jorge Alejandro Rojas, proceeding pro se, and Defendants Ronen Ohayon, Joseph Daniel Ruffin, Anastas Eddie Arutyunyan, and All State Remodeling, Inc's, through undersigned counsel, stipulate as follows and request the Court extend the deadline for Defendants to file an amended answer to Plaintiff's Amended Complaint and/or for Plaintiff to file a Motion to Strike the Answer, by twenty-one calendar days to and including November 1, 2022. In support, the parties state as follows:

Defendants filed their Answer to Plaintiff's Amended Complaint on September 18, 2022. Dkt. 35. On September 20, 2022, Plaintiff began the conferral process with Defendants concerning a Motion to Strike Defendants Affirmative Defenses. Plaintiff's motion to strike is currently due, pursuant to Fed. R. Civ. P. 12(f), on October 11, 2022, as October 10, 2022 is a holiday.

1 Because of opposing counsel's schedule related to trials, religious holidays, and to  
2 facilitate conferral, the parties request a twenty one calendar day extension of time, to  
3 November 1, 2022, within which for Defendant to file an amended answer, or for Plaintiff  
4 to file a Motion to Strike. To the extent that Defendant files an amended answer, Plaintiff's  
5 deadline to move to strike would reset based on that amended pleading.

6 This extension is requested for good cause and is not for the purposes of delay. The  
7 parties hope this additional time will allow for conferral concerning the issues Plaintiff has  
8 with Defendants' affirmative defenses and would promote judicial economy, as any  
9 amended pleading which resolves all or some of the issues would reduce any briefing  
10 required concerning a motion to strike.

11 The parties respectfully request that the Court approve this stipulation, and extend  
12 the time for Defendants file an amended answer to Plaintiff's Amended Complaint or for  
13 Plaintiff to file a Motion to Strike to November 1, 2022.

14 Respectfully submitted,

15 Dated: October 6, 2022

16 /s/ Jorge Alejandro Rojas  
17 Jorge Alejandro Rojas  
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19 Plaintiff in Pro Se  
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20 /s/ Elliott N. Tiomkin  
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*Attorneys for Defendants*

25 **CERTIFICATE OF CONCURRENCE**

26 I attest that all other signatories listed, and on whose behalf this filing is submitted,  
27 concur in the filings content and have authorized this filing.

28 /s/ Jorge Alejandro Rojas  
Jorge Alejandro Rojas

**CERTIFICATE OF SERVICE**

I certify that this document will be sent to all parties via CM/ECF to their counsel of record.

*/s/ Jorge Alejandro Rojas*  
Jorge Alejandro Rojas